

KRYSTA KAUBLE PACHMAN (280951)
kpachman@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, California 90067-6029
Telephone: (310) 789-3100

SHAWN J. RABIN (*pro hac vice*)
srabin@susmangodfrey.com
SUSMAN GODFREY L.L.P.
One Manhattan West, 50th Floor
New York, New York 10019
Telephone: (212) 336-8830

(Additional counsel on signature page)

Attorneys for Plaintiffs MEGAN TRAMA, MATTHEW HARTZ, and RAFAEL ROBLES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

MEGAN TRAMA, MATTHEW HARTZ, and RAFAEL ROBLES on behalf of themselves and all others similarly situated.

Plaintiffs,

V.

RELX INC.

Defendant.

Case No. 2:24-cv-3174-DSF (Ex)

Judicial Officer: Hon. Dale S. Fischer

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

Date: November 3, 2025

Time: 1:30 p.m.

Courtroom: 7D

1 **TO THE COURT, ALL PARTIES, AND ALL COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE THAT on November 3, 2025 at 1:30 p.m., or as
3 soon as this matter may be heard, Plaintiffs Megan Trama, Matthew Hartz, and Rafael
4 Robles, on behalf of themselves and all others similarly situated (“Plaintiffs”),
5 respectfully move this Court for preliminary approval of the settlement reached in
6 this case, the terms of which Plaintiffs describe in the Memorandum of Points and
7 Authority in support of this Motion. This Motion will be heard before the Honorable
8 Dale S. Fischer of the above-named Court. The Court is located at the First Street
9 Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles, California 90012.

10 Plaintiffs request that the Court enter the proposed Preliminary Approval
11 Order and: (1) conditionally certify the Settlement Class (as defined in the settlement
12 agreement) under Federal Rule of Civil Procedure 23(b)(2); (2) appoint Plaintiffs’
13 counsel as class counsel for purposes of the settlement; (3) preliminarily approve the
14 settlement agreement; and (4) schedule a Final Approval Hearing.

15 This Motion is based on the Notice of Motion, the accompanying
16 Memorandum of Points and Authorities, the Settlement Agreement (Ex. 1), the
17 Declaration of Krysta Pachman (Ex. 2), the pleadings, records, and other filings in
18 the case, and other such matters and argument as the Court may consider at the
19 hearing of this Motion.

20 Pursuant to L.R. 7-3, this Motion is unopposed and is filed with the consent of
21 counsel for Defendant RELX, Inc.

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1 Dated: October 3, 2025

Respectfully submitted,

2 By: /s/ Krysta Kauble Pachman

3 Krysta Kauble Pachman

4 Krysta Kauble Pachman (280951)
5 kpachman@susmangodfrey.com
6 **SUSMAN GODFREY L.L.P.**
7 1900 Avenue of the Stars, Suite 1400
8 Los Angeles, California 90067-6029
9 Telephone: (310) 789-3100
Facsimile: (310) 789-3150

10 Shawn J. Rabin (*pro hac vice*)
11 srabin@susmangodfrey.com
12 **SUSMAN GODFREY L.L.P.**
13 One Manhattan West, 50th Floor
New York, New York 10001
Telephone: (212) 336-8830

14 Alejandra C. Salinas (*pro hac vice*)
15 asalinas@susmangodfrey.com
16 **SUSMAN GODFREY L.L.P.**
17 1000 Louisiana Street, Suite 5100
Houston, Texas 77002
18 Telephone: (713) 651-9366

19 Don Bivens (*pro hac vice*)
20 don@donbivens.com
21 **DON BIVENS, PLLC**
22 15169 N. Scottsdale Rd., Suite 205
Scottsdale, Arizona 85254
23 Telephone: (602) 708-1450

24 *Attorneys for Plaintiffs*
25 MEGAN TRAMA, MATTHEW HARTZ,
and RAFAEL ROBLES